

SAS® Global Hosting and US Professional Services Business Customer Privacy Policy for South Africa

Commitment to Privacy

SAS Global Hosting and US Professional Services (“we”, “us” and “our”) is a SAS business unit offering software as a service (SaaS), enterprise hosting, remote managed services and other analytics solutions, and the subject-matter experts to manage them. We provide these solutions to organizations (“you” and “your”) and your employees, consumers, patients and students (“data subjects”) around the world.

The privacy of your data subjects is important to us. We are providing this policy to describe and explain our information practices and the measures we take to protect their privacy and comply with applicable law and our obligations. This policy also describes your choices regarding use, access and correction of your data subjects’ personal information so that you can better understand our practices and ensure that they are consistent with any privacy notices you have made available to them.

Scope of Policy

This Privacy Policy describes how the SAS Global Hosting and US Professional Services business unit collects, receives, accesses, uses and discloses certain personal information that it receives in connection with enterprise hosting, SaaS, remote managed services and other analytics offerings, and governs SAS Global Hosting and US Professional Services’ use of such personal information to provide those offerings to customers pursuant to our agreements with them.

This Privacy Policy does not apply to information collected by SAS from visitors to SAS.com, information collected by SAS in connection with individuals’ creation of a [SAS Profile](#), or information collected by SAS through other offerings. For information about how SAS collects, uses and discloses information through SAS.com, the [SAS Profile](#) and other SAS offerings, please see the [SAS Privacy Statement](#).

Data Processed and Purposes of Processing

SAS Global Hosting and US Professional Services collects and processes two kinds of personal information: Customer Information and Client Information.

Customer Information is information that we receive from you, or from a third party at your direction, about your data subjects. We collect only the Customer Information that you provide to us or direct us to collect in order to provide services to you. Customer Information may include personal information about different types of individuals, including: consumers, employees, patients, students, donors, volunteers, business clients, suppliers and other business partners. Such personal information may include basic contact information, such as name, postal address, email address and phone number, as well as more sensitive or special personal information, such as financial information, personal health information, clinical trial data, demographic information, purchase information, market-research information, and employee and student performance information. Indeed, SAS Global Hosting and US Professional Services may obtain any type of data about any type of individual that you upload to our products, send to us through online or offline mechanisms, or direct us to collect from third-party aggregators, such as Dun & Bradstreet.

We operate under the assumption that it is your obligation as a responsible party to notify individuals whose personal information may be included in your Customer Information about the personal information you collect and the purposes for which you collect it, to obtain their consent to our processing of their personal information, where required, and to ensure that such personal information is reliable for its intended use, accurate, complete and current. We have no direct relationship with the individuals whose personal information is included in Customer Information we process.

We collect and process Customer Information only for the purpose of providing services to you and in accordance with our agreements with you. In certain situations, we may supplement Customer Information provided by you with information from other sources. This is done only when you specifically request, and we agree to, such supplementation. This supplementation of Customer Information is for the sole purpose of providing services to you. We will retain Customer Information for the duration stipulated in our agreement with you, or longer, as necessary to comply with our legal obligations, resolve disputes or enforce our agreements.

Client Information is personal information about people in your organisation, such as account managers and users, who interact with SAS Global Hosting and US

Professional Services and its systems. Client Information usually is limited to name, work email address, work phone number and job title. We collect Client Information through online forms, email, phone and other written means that you use to provide it to us. We use Client Information to support your account, maintain our business relationship with you, respond to your inquiries and perform accounting functions.

Client Information may also include User Information. **User Information** is information generated by computers that interact with our systems. User Information may be collected through the following:

- **Web server logs.** In the process of administering this site, we maintain and track usage through web server logs. These logs provide information, such as what types of browsers are accessing our sites, what pages receive high traffic and the times of day our servers experience significant load. We use this information to improve the content and navigation features of our sites. Anonymised or aggregated forms of this data may be used to identify future features and functions to develop for the site and to provide better customer service.
- **Cookies and other tracking technologies.** There are various tracking technologies, including "cookies," which can be used by us to provide tailored information from a website. A cookie is an element of data that a website can send to your browser, which may then store it on your system. Some SAS Global Hosting and US Professional Services systems may use cookies for authentication and security and/or to remember user settings so that we can better serve you when you return to those systems. By using those systems, you agree that we can place these types of cookies on your system. You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it. You can control the use of cookies at the individual browser level. For more information, please refer to the user information provided with your web browser. If you reject cookies, you may still use SAS Global Hosting and US Professional Services systems, but your ability to use some features or areas of those systems may be limited.

We may also use User Information to help us prevent and detect security threats, fraud or other malicious activity, and to ensure the proper functioning of our products and services.

SAS Global Hosting and US Professional Services may additionally use Customer Information and Client Information for the following purposes:

- **To maintain and upgrade a system.** Our technical staff may require periodic access to services data that may include Customer Information or Client Information, to monitor system performance, test systems, and develop and implement upgrades to systems. Any temporary copies of such services data created as a necessary part of this process are maintained only for time periods relevant to those purposes.

- **To address performance and fix issues.** On occasion, we may develop new versions, patches, updates and other fixes to our programs and services, such as security patches addressing newly discovered vulnerabilities. In accordance with the terms of your order for services, we may remotely access a user's computer, while that user observes, in order to troubleshoot a performance issue.
- **To meet legal requirements.** SAS Global Hosting and US Professional Services may be required to provide personal information to comply with legally mandated reporting, disclosure or other legal process requirements when we believe, in our sole discretion, that disclosure is necessary to protect our rights, or to respond to a government request.

Third-Party Websites

If requested by you, and agreed to by SAS Global Hosting and US Professional Services, SAS Global Hosting and US Professional Services' systems may be configured to enable you and your users to access other third-party websites whose privacy practices may differ from those of SAS and SAS Global Hosting and US Professional Services. If you or your data subjects submit personal information to any of those websites, such information is governed by their privacy statements. We encourage you and your data subjects to carefully read the privacy statement of any website you or your data subjects access through our systems.

Data Access and Correction; Choices for Limiting Use and Disclosure

The Protection of Personal Information Act, 2013 ("POPIA") provides data subjects with certain rights to access personal information about themselves that an organisation holds and, more specifically, a right to: (1) obtain confirmation whether personal information about them is being processed; (2) access to the personal information (3) request the identities or categories of third parties to whom the personal information has been disclosed to (4) correction of incomplete, inaccurate, irrelevant, excessive, misleading, outdated or unlawfully obtained personal information (5) deletion or destruction of personal information under certain circumstances.

With respect to Customer Information, we operate under the assumption that it is your obligation as a responsible party to provide your data subjects a means of accessing their data and requesting that such data be corrected, amended or deleted. Under our current business model, we have no direct interaction with your data subjects and so have no direct way for them to submit these requests to us. If you are a SAS Global Hosting and US Professional Services customer, and you receive such a request from

a data subject about whom we host personal information, and you would like our assistance in responding to that request, please contact our privacy office at privacy@sas.com or Legal Division/Privacy Officer, SAS Campus Drive, Cary, NC 27513. We will respond to requests within 30 days of receipt.

With respect to Client Information, certain SAS Global Hosting and US Professional Services systems enable users to access and amend or correct their own personal information. Otherwise, if you or your users would like to request access to or correction of Client Information, please contact our privacy office at privacy@sas.com or Legal Division/Privacy Officer, SAS Campus Drive, Cary, NC 27513. We will respond to requests within 30 days of receipt.

Where we are required to collect special personal information or information related to children, we will only do so in accordance with POPIA.

With respect to Customer Information, we operate under the assumption that it is your obligation as a responsible party to obtain from your data subjects the appropriate consent to transfer their data to us and for us to process their data, to provide agreed-upon services to you and to disclose their data to third parties, consistent with this Policy and our agreements with you. We will not share, sell, rent or trade with third parties for their marketing purposes any Customer Information collected by us, unless you direct us to do so and have the appropriate authorisation to do so. If your data subject would no longer like to be contacted by you or by SAS at your direction, please inform the data subject to contact you, as SAS Global Hosting and US Professional Services' customer, directly.

We will not use or disclose Client Information for purposes that are materially different than those described in this Policy, or subsequently authorised, without offering data subjects a choice to opt out of such uses or disclosures.

Data Security

We take reasonable measures that are designed to protect personal information from loss, misuse and unauthorised access, disclosure, alteration and destruction. Some of our security measures include the following:

- **Security policies.** We design and support our products and services according to documented security policies. Each year, we assess our policy compliance and make necessary improvements to our policies and practices.
- **Employee training and responsibilities.** We take certain steps to reduce the risks of human error, theft, fraud and misuse of our facilities. We train our personnel on our privacy and security policies, and we require our employees to sign confidentiality agreements. We also have assigned to an individual the responsibility to manage our information security program.
- **Access control.** We limit access to Customer Information to only those individuals who have an authorized purpose for accessing that information. We terminate those access privileges following job change or termination.
- **Data encryption.** All electronic transfers of non-public Customer Information between you and SAS Global Hosting and US Professional Services (including sensitive personal information and sign-on credentials) are required by SAS to be done through encrypted connections.

If we confirm that your Customer Information has been accessed or used by unauthorised individuals, we will contact your designated representative to coordinate our response to the incident. If you have any questions about the security of your personal information, you can contact us at privacy@sas.com or Legal Division/Privacy Officer, SAS Campus Drive, Cary, NC 27513.

Onward Transfers to Third Parties

SAS Global Hosting and US Professional Services may disclose personal information to business partners and subcontractors, as necessary, for the purpose of providing our offerings and performing other requested services, or as otherwise appropriate in connection with a legitimate business need. These companies are authorised to use your personal information only as necessary to provide these services to us. We may also disclose personal information you provide to other SAS entities and/or business parties for purposes compatible with those described in this Policy and in accordance with our agreements with you. We will not disclose personal information to third parties for purposes other than those described in this Policy, except at your direction and with your authorisation. Disclosures of Personal information will be carried out in accordance with POPIA relating to onward transfers. We will not sell, rent or lease your personal information to others.

We may also disclose personal information to a third party, as necessary, in connection with the sale or transfer of all or part of our business. In these situations, we will require the recipient of the data to protect the data in accordance with this Policy

or otherwise take steps to ensure that the personal information is appropriately protected. If SAS Global Hosting and US Professional Services is involved in a sale or transfer of all or part of our business, you will be notified via email and/or a prominent notice on our website of any changes to SAS Global Hosting and US Professional Services' ownership or uses of your personal information , and of choices you may have regarding your personal information.

SAS Global Hosting and US Professional Services may also disclose personal information as required or permitted by law, such as in response to lawful requests by public authorities, including to meet national security or law enforcement requirements, or when we believe in our sole discretion that disclosure is necessary or appropriate to protect our rights or to comply with a judicial proceeding, court order, law-enforcement request or other legal process.

SAS is a global corporation with subsidiaries and business partners in more than 80 countries and with technical systems that cross borders. Personal information collected on SAS Global Hosting and US Professional Services systems may be transferred across state and country borders and stored or processed in the United States or any other country in which SAS, its subsidiaries, affiliates or business units maintain facilities for the purposes of data consolidation, storage and information management. By using our systems, your organisation consents to any such transfer of information outside of South Africa . SAS, its subsidiaries, affiliates and business units will handle your information collected by our systems in a consistent manner, as described here, even if the laws in some countries may provide less protection for your information. Our privacy practices are designed to protect your personal information all over the world.

Inquiries and Complaints

If you have questions or concerns regarding this Policy or our handling of your personal information, you should first contact us by sending an email to privacy@sas.com or by regular mail to the attention of:

Legal Division/ Privacy Officer

93 Central Street

Houghton

Johannesburg

We will respond within a reasonable time frame.

Changes to This Policy

We reserve the right to modify this Policy at any time. When we make only minor modifications, we may do so without notifying you. When we make material modifications, we will notify the person you have designated to us to receive such notifications 30 days in advance of the changes. It is your responsibility to keep current the contact information we have on file for that designated representative.

Effective Date: 1 July 2021